

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ROY STEWART MOORE, et al

Plaintiffs,

v.

SASHA NOAM BARON COHEN, et al

Defendants.

**Index No. 19 Civ. 4977 (ALC)**

**ORAL ARGUMENT REQUESTED**

**SUPPLEMENT TO PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO  
DISMISS**

Plaintiffs Roy Moore ("Judge Moore") and Kayla Moore ("Ms. Moore") (collectively "Plaintiffs") submit the following supplement to their Opposition to Defendants' Motion to Dismiss. The attached, Exhibit 1, is a copy of the letter referenced at page 1 of the Opposition, as well as ¶¶ 23-24 of the Complaint, putting Showtime and CBS on notice not to broadcast the alleged defamatory statements at issue.

**Dated:** October 29, 2019

Respectfully Submitted,

/s/ Larry Klayman

Larry Klayman, Esq.  
KLAYMAN LAW GROUP P.A.  
2020 Pennsylvania Ave NW # 800  
Washington, D.C. 20006  
(561) 558-5536  
Email: [leklayman@gmail.com](mailto:leklayman@gmail.com)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed electronically and served through the court's ECF system to all counsel of record or parties on October 29, 2019.

/s/ Larry Klayman

Larry Klayman, Esq.

Mr. David Nevins  
President & CEO  
Showtime Networks, Inc.  
1633 Broadway  
New York, NY 10019

Leslie Moonves, CEO  
CBS Corporation  
51 W. 52<sup>nd</sup> Street  
New, NY 10019

**RE:** *Fraudulently obtained interview with Judge Roy Moore*

Dear Mr. Nevins:

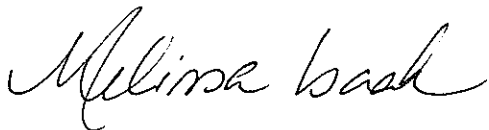
PLEASE BE ADVISED that my client, Judge Roy Moore, was fraudulently induced to fly to Washington, DC in mid-February 2018 for an interview with so-called Yerushalayim TV. I understand that Showtime and CBS intend to air this interview.

During that interview, Judge Moore signed a release. However, "[a] release obtained by fraud is void." *Taylor v. Dorough*, 547 So. 2d 536, 540 (Ala. 1989).

If CBS/Showtime airs an episode based on the above-referenced fraudulently obtained interview that defames my client, resort to appropriate legal remedies will follow.

This letter is a preemptive notice under § 6-5-186, Ala. Code 1975.

Sincerely,

A handwritten signature in cursive script, appearing to read "Melissa L. Isaak".

Melissa L. Isaak

Isaack Law Firm  
1290 Shellfield Rd  
Enterprise, AL 36330

EE 136181280 US

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POSTAL SERVICE®PRIORITY  
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## PAYMENT BY ACCOUNT (if applicable)

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☒ SIGNATURE REQUIRED Note: The mailer must check the "Signature Required" box if the mailer: 1) Requires the addressee's signature; OR 2) Purchases additional insurance; OR 3) Purchases COD service; OR 4) Purchases Return Receipt service. If the box is not checked, the Postal Service will leave the item in the addressee's mail receptacle or other secure location without attempting to obtain the addressee's signature on delivery.

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☐ Sunday/Holiday Delivery Required (additional fee, where available)  
☐ 10:30 AM Delivery Required (additional fee, where available)  
 \*Refer to USPS.com® or local Post Office™ for availability.

TO: (PLEASE PRINT)

PHONE ( )

Mr. David Nevins  
President & CEO  
Showtime Networks, Inc.  
1633 Broadway  
New York, NY 10019

ZIP + 4® (U.S. ADDRESSES ONLY)

1 0 0 1 9 -

- For pickup or USPS Tracking™, visit USPS.com or call 800-222-1811.  
 ■ \$100.00 insurance included.

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☒ 1-Day☐ 2-Day☐ Military☐ DPO

PO ZIP Code

Scheduled Delivery Date  
(MM/DD/YY)

Postage

36330

07/27/18

\$24.70

Date Accepted (MM/DD/YY)

Scheduled Delivery Time

Insurance Fee

COD Fee

07/26/18

☐ 10:30 AM ☐ 3:00 PM  
☒ 12 NOON

\$

\$

Time Accepted

10:30 AM Delivery Fee

Return Receipt Fee

Live Animal  
Transportation Fee2:10 ☐ AM ☒ PM

\$

\$2.75

\$

Special Handling/Fragile

Sunday/Holiday Premium Fee

Total Postage &amp; Fees

\$

\$

\$

Weight

Flat Rate

Acceptance Employee Initials

2-1 lbs. ozs.

BS

\$27.45

## DELIVERY (POSTAL SERVICE USE ONLY)

Delivery Attempt (MM/DD/YY)

Time

Employee Signature

☐ AM  
☐ PM

Delivery Attempt (MM/DD/YY)

Time

Employee Signature

☐ AM  
☐ PM

LABEL 11-B, OCTOBER 2016

PSN 7590-02-000-9995

2-CUSTOMER CO

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FROM: (PLEASE PRINT)

PHONE (334) 770-4636

Isaack Law Firm  
1290 Shellfield Rd  
Enterprise, AL 36330



EE 136181276 US

UNITED STATES  
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USPS® Corporate Acct. No.

Federal Agency Acct. No. or Postal Service™ Acct. No.

## DELIVERY OPTIONS (Customer Use Only)

☒ SIGNATURE REQUIRED Note: The mailer must check the "Signature Required" box if the mailer: 1) Requires the addressee's signature; OR 2) Purchases additional insurance; OR 3) Purchases COD service; OR 4) Purchases Return Receipt service. If the box is not checked, the Postal Service will leave the item in the addressee's mail receptacle or other secure location without attempting to obtain the addressee's signature on delivery.

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☐ 10:30 AM Delivery Required (additional fee, where available)  
 \*Refer to USPS.com® or local Post Office™ for availability.

TO: (PLEASE PRINT)

PHONE ( )

Leslie Moonves, CEO  
CBS Corporation  
51 W 52nd St  
New York, NY 10019

ZIP + 4® (U.S. ADDRESSES ONLY)

1 0 0 1 9 -

- For pickup or USPS Tracking™, visit USPS.com or call 800-222-1811.  
 ■ \$100.00 insurance included.

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☒ 1-Day☐ 2-Day☐ Military☐ DPO

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(MM/DD/YY)

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36330

07/27/18

\$24.70

Date Accepted (MM/DD/YY)

Scheduled Delivery Time

Insurance Fee

COD Fee

07/26/18

☐ 10:30 AM ☐ 3:00 PM  
☒ 12 NOON

\$

\$

Time Accepted

10:30 AM Delivery Fee

Return Receipt Fee

Live Animal  
Transportation Fee2:07 ☐ AM ☒ PM

\$

\$

\$

Special Handling/Fragile

Sunday/Holiday Premium Fee

Total Postage &amp; Fees

\$

\$

\$

Weight

Flat Rate

Acceptance Employee Initials

2-1 lbs. ozs.

BS

\$27.45

## DELIVERY (POSTAL SERVICE USE ONLY)

Delivery Attempt (MM/DD/YY)

Time

Employee Signature

☐ AM  
☐ PM

Delivery Attempt (MM/DD/YY)

Time

Employee Signature

☐ AM  
☐ PM

LABEL 11-B, OCTOBER 2016

PSN 7590-02-000-9995

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=====

ENTERPRISE  
616 GLOVER AVE  
ENTERPRISE  
AL  
36330-2008  
0127600330  
07/26/2018 (800)275-8777 2:11 PM  
=====

Product Description	Sale Qty	Final Price
PM Exp 1-Day Flat Rate Env (Domestic) (NEW YORK, NY 10019) (Flat Rate) (Signature Requested) (Scheduled Delivery Date) (Friday 07/27/2018 12:00 PM) (Money Back Guarantee) (USPS Tracking #) (EE136181276US)	1	\$24.70
PM Exp Insurance (Up to \$100.00 included)	1	\$0.00
Return Receipt (@@USPS Return Receipt #) (9590940240038079567762)	1	\$2.75
PM Exp 1-Day Flat Rate Env (Domestic) (NEW YORK, NY 10019) (Flat Rate) (Signature Requested) (Scheduled Delivery Date) (Friday 07/27/2018 12:00 PM) (Money Back Guarantee) (USPS Tracking #) (EE136181280US)	1	\$24.70
PM Exp Insurance (Up to \$100.00 included)	1	\$0.00
Return Receipt (@@USPS Return Receipt #) (9590940240038079567779)	1	\$2.75
<b>Total</b>		<b>\$54.90</b>
Cash		\$60.00
Change		(\$5.10)

Includes up to \$100 insurance

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